

McGRAIL & BENSINGER LLP

Patrick Train-Gutiérrez
888-C 8th Avenue #107
New York, NY 10019
Ph: (917) 238-5422
Ptrain-gutierrez@mcgrailbensinger.com

August 11, 2023

Via ECF

Honorable Arun Subramanian
United States District Judge
500 Pearl Street
New York, NY 10007

**Re: Solid 21, Inc. v. Richemont North America, Inc. *et al.* Case No. 19 Civ. 1262
(LGS) – Joint Adjournment Request**

Dear Judge Subramanian:

This firm represents Plaintiff, Solid 21, Inc., in the above referenced action. We write to seek an adjournment of the hearing currently set for August 22, 2023 (the “Hearing”), as set in the Court’s Scheduling Order from earlier today. (Dkt. No. 263). This is the first request for such an adjournment. Counsel for Defendants consents to this request as well as to either proposal for moving forward set forth below.

The undersigned is scheduled to be on a long-planned family vacation outside of the country during the week of August 21-25. As a result, appearance in person for the Hearing on August 22, would be impossible for Plaintiff’s counsel. To avoid this conflict, we propose two scenarios for adjourning the Hearing, subject to the Court’s availability.

Scenario 1

The Hearing is accelerated to the week of August 14, 2023, except for August 17th when counsel for Defendants has a conflict. While the Parties are amenable to this acceleration, it is not either side’s preference, as the preparation time for oral argument on all open motions would be very short.

Scenario 2

The Hearing is adjourned to a date during the week of August 28, 2023, except for August 31, 2023, when Defendants’ counsel has a conflict. This adjournment is preferred by the Parties but comes with its own set of concerns, as the Hearing would then be perilously close to certain pre-trial submission dates. Namely, September 5, 2023 – for joint requests to charge, *voir dire*, and verdict form and September 12, 2023 – for a final pretrial order.

The joint proposed solution would be to adjourn each of these dates as follows:

- Hearing adjourned from August 22, 2023 ~~to any date between August 28 30, or on September 1, 2023;~~ **August 30, 2023 at 10AM**
- Joint pre-trial submissions adjourned from September 5, 2023 to September 12, 2023;
- Final pretrial order adjourned from September 12, 2023 to September 19, 2023; and
- Trial date remains October 10, 2023, unless otherwise ordered by the Court.

We appreciate the Court's attention to this request and can be available for a call to discuss the proposed scenarios at the Court's earliest convenience.

Respectfully submitted,



Patrick Train-Gutiérrez

Cc: Counsel of Record (via ECF)

The hearing and pretrial deadlines are adjourned as set out above.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Date: August 14, 2023